

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

MARY ALICE MARGARET HANNON
A/K/A MARY HANNON
A/K/A MARY ALICE HANNON
Debtor

CHAPTER 13

CASE NO. 5:06-bk-51870-JJT

MARY ALICE MARGARET HANNON

Re: Doc. 58 (Motion for Sanctions under
11 U.S.C. § 105 and the Court's inherent
power)

Movant

vs.

COUNTRYWIDE HOME LOANS, INC.
Respondent

Consent Motion to Compel Discovery

1. On December 3, 2008 the debtor filed and served upon the respondent a motion for sanctions under 11 U.S.C. § 105 and this Court's inherent power alleging that the respondent's proof of claim sought payment of an incorrect mortgage arrears. (Doc. 58)

2. The debtor simultaneously served discovery in connection with the motion. On January 5, 2009, the debtor gave the respondent an extension until January 16, 2009 to respond to the discovery.

3. The respondent requires more time to respond to discovery, and the parties consent to the entry of the attached order requiring a response by January 30, 2009.

Wherefore, the parties respectfully request that this Honorable Court enter the proposed order.

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